



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

APR 05 2007

REPLY TO THE ATTENTION OF: DE-9

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

OHD077783603
FERRO CORP CLEVELAND PAD
1636 WAYSIDE ROAD
CLEVELAND, OH 44112

RE: OHD077783603
FERRO CORP CLEVELAND PAD

Dear Plant Manager/President:

The Ohio Environmental Protection Agency (OEPA) and the United States Environmental Protection Agency (U.S. EPA) have compiled a list of all facilities deemed appropriate and important to address using the Resource Conservation and Recovery Act's (RCRA) Corrective Action Program. Because this set of 3,880 facilities has national remediation goals which will culminate in the year 2020, it is referred to as the 2020 Corrective Action Universe. **Your facility is part of this 2020 Universe.**

As a result, the OEPA and U.S. EPA expect that a final remedy will be in place (i.e. remedy construction completed) at your facility by 2020 (although actual attainment of cleanup goals through remedy implementation may take a while longer). If we have not already done so, we will be working with you to develop a plan and a schedule that achieves this goal before 2020.

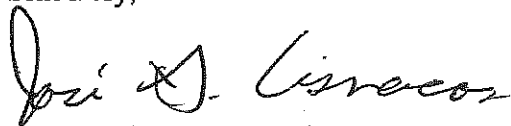
Your facility has been included in the 2020 Universe because *one or more of the following is true:*

- It already belongs to the 2008 Corrective Action Baseline,
- It has a RCRA permit obligation,
- OEPA and U.S. EPA agreed that it needs to be addressed under the RCRA Corrective Action Program.

Inclusion on this list does not imply failure on your part to meet any legal obligation, nor should it be construed as an adverse action against you. It only means that OEPA and U.S. EPA have identified your facility—and every other facility in the 2020 Universe—as needing to complete RCRA Corrective Action if they have not done so already. Our national program goal is to largely address these cleanup obligations before the end of 2020. Accordingly, progress will be tracked for each facility in the 2020 Universe. The list of facilities will be posted on our web site at <http://www.epa.gov/correctiveaction> on April 16, 2007.

U.S. EPA Region 5 will work to address remediation concerns at your facility in a manner consistent with your plans for the property. If you believe that facility-wide corrective actions are already complete for your site, or if you have any questions regarding this letter, please contact George Hamper at (312) 886-0987.

Sincerely,

A handwritten signature in black ink, appearing to read "Jose G. Cisneros". The signature is fluid and cursive, with the first name "Jose" being more prominent.

Jose G. Cisneros, Chief
Waste Management Branch



Facility Profile Report

EPA Office of Environmental Information

[Return](#)**TRI Facility Profile**

TRI Facility Name: **FERRO CORP. POLYMER ADDITIVES
DIV.**
Address: 1000 WAYSIDE RD.
CLEVELAND, OH 44110
County: CUYAHOGA
Public Contact: PAUL ANGUS
Phone Number: 216 531-6010

Forms Submitted to TRI in 1998 Reporting Year:

Form R (regular form): 4

Form A (short form): 0

Reported Standard Industrial Classification (SIC) Code(s):

2869 IND ORGANIC CHEMS

Reported TRI Chemical Data
(in pounds, for all chemicals reported
in 1998)

<u>Total On-site Releases:</u>	1,060
<u>Total Off-site Releases:</u>	26,332
<u>Total Transfers Off-site for Further Waste Management:</u>	3,760
<u>Total Waste Managed:</u>	38,745

TRI Facility Trend Graphs (click to view trend graph)

Total On- and Off-site Releases
Total Transfers Off-site for Further Waste Management
Total Waste Managed

TRI Chemical Trend Table (click to view trend table)
(all chemicals reported to TRI between 1988 and 1998)

Row #	Chemical	On- and Off-site Releases Trend	Transfers Off-site for Further Waste Management Trend	Quantities of TRI Chemicals in Waste Trend	EPA's IRIS Substance File (Risk Information) ⓘ
1	4,4'-ISOPROPYLIDENEDIPHENOL	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
2	BARIUM COMPOUNDS	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
3	CADMIUM COMPOUNDS	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
4	N-DIOCTYL PHTHALATE	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
5	SODIUM HYDROXIDE (SOLUTION)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
6	ZINC COMPOUNDS	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	

Other TRI Facility Information

Latitude: 041-33-19
Longitude: 081-33-37
Parent Company Name: FERRO CORP.
Parent Company Dun and Bradstreet: 004161477
TRI Facility ID Number: 44110SYNTH1000W
RCRA ID Number (Land):

Down load all data for FERRO CORP. POLYMER ADDITIVES DIV.

Note: Reporting year (RY) 1998 is the most recent TRI data available. Facilities reporting to TRI were required to submit RY 1998 data to EPA by July 1999. TRI Explorer is using a "frozen" data set that includes revisions submitted to EPA as of March 29, 2000 for the years 1988 to 1998 (i.e., revisions submitted to EPA after this time are not reflected in TRI Explorer reports). Please access EPA Envirofacts to view TRI data with the most recent revisions.

[Back to top](#)

Facility Profile Report
 Go to [TRI Explorer Home](#) | [Return](#)

February 20, 2001
[Comments?](#)

This request took 6.03 seconds of real time (v8.0 build 1330).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

October 22, 1992

Mr. John Sundermeyer
Synthetic Products Company
16601 St. Clair Avenue
Cleveland, OH 44110

Re: Visual Site Inspection
Synthetic Products Company
Cleveland, OH 44110
OHD 077 783 603

Dear Mr. Sundermeyer:

As indicated in the letter of introduction sent to you on January 30, 1992, the U.S. Environmental Protection Agency is enclosing a copy of the final Preliminary Assessment/Visual Site inspection (PA/VSI) report for the referenced facility. The executive summary and conclusions and recommendations sections have been withheld as Enforcement Confidential.

If you have any questions, please call Francene Harris at (312) 886-2884.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Kevin M. Pierard".

Kevin M. Pierard, Chief
Minnesota/Ohio Technical Enforcement Section
RCRA Enforcement Branch

PRC Environmental Management, Inc.
233 North Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118



**PRELIMINARY ASSESSMENT/
VISUAL SITE INSPECTION**

**SYNTHETIC PRODUCTS COMPANY
CLEVELAND, OHIO
OHD 077 783 603**

FINAL REPORT

Prepared for

**U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460**

Work Assignment No.	:	C05087
EPA Region	:	5
Site No.	:	OHD 077 783 603
Date Prepared	:	September 1, 1992
Contract No.	:	68-W9-0006
PRC No.	:	009-C05087OH3J
Prepared by	:	PRC Environmental Management, Inc. (Tom Sinski)
Contractor Project Manager	:	Shin Ahn
Telephone No.	:	(312) 856-8700
EPA Work Assignment Manager	:	Kevin Pierard
Telephone No.	:	(312) 886-4448

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RELEASED

DATE

RIN #

INITIALS

EXECUTIVE SUMMARY

ENFORCEMENT
CONFIDENTIAL

PRC Environmental Management, Inc. (PRC) performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Synthetic Products Company (Synpro) facility in Cleveland, Ohio. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in setting priorities among RCRA facilities for corrective action.

The Synpro facility manufactures metal stearate stabilizers. The stabilizers are used as additives to strengthen plastics, mainly polyvinyl chloride (PVC). The facility generates and manages wastes that contain barium (EPA waste code D005) and cadmium (D006). It occupies approximately one acre in a mixed industrial, commercial, and residential area of Cleveland and employs 55 to 60 people. The facility's regulatory status is that of a conditionally exempt small quantity generator. The facility has operated at its current location since 1950 and has undergone several ownership changes since then. However, it always has been referred to as Synthetic Products. Before 1980, the facility manufactured liquid and powder stabilizers. Liquid stabilizer production was moved to another location in 1980. The facility closed its hazardous waste storage building (SWMU 1) in 1988.

The PA/VSI identified the following 2 SWMUs at the facility:

Solid Waste Management Units

1. Former Hazardous Waste Drum Storage Building
2. Hazardous Waste Drum Storage Area

No AOCs were identified at the facility.

The potential for releases of hazardous wastes or hazardous constituents to ground water from this facility is low. SWMU 1, the former hazardous waste drum storage building, is inactive. The hazardous waste drum storage area (SWMU 2) manages wastes in solid form that are resistant to flow. In addition, SWMU 2 is inside the main manufacturing building.

The potential for release of hazardous wastes or hazardous constituents to air, surface water, or on-site soil from the facility is also low. The former hazardous waste drum storage building (SWMU 1) is inactive. The hazardous waste drum storage area (SWMU 2) manages wastes in solid form and is inside the main manufacturing building.

Receptors of potential releases at the facility include Synpro personnel, nearby residents and light industry workers. Residential areas lie within 200 feet of the facility. A 6-foot chain-link fence, topped by 3 strands of barbed wire, surrounds the facility, limiting access by potential receptors. Ground water in the area is not used for drinking or as an industrial water supply. Sensitive environments include a riverine wetland area along Euclid Creek, located 1.5 miles east of Synpro. Lacustrine wetlands also are located along the eastern shore of Lake Erie 1.75 miles northwest of the facility.

PRC recommends repairing the surface cracks near SWMU 2 and improving the secondary containment for SWMU 2 by either sealing the drain near the SWMU or building a dike or berm around the SWMU. A second option for improving the secondary containment would be to store drums containing hazardous waste in SWMU 1, the former hazardous waste drum storage building, since it was designed for that purpose.

PRC recommends no further action for SWMU 1.

RELEASED

DATE

RIN #

INITIALS

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC) received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of setting priorities among facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading-unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility.
- Obtain information on the operational history of the facility.
- Obtain information on releases from any units at the facility.
- Identify data gaps and other informational needs to be filled during the VSI.

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA.
- Identify releases not discovered during the PA.
- Provide a specific description of the environmental setting.
- Provide information on release pathways and the potential for releases to each medium.
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases.

The VSI includes interviewing appropriate facility staff; inspecting the entire facility to identify all SWMUs and AOCs, photographing all visible SWMUs; identifying evidence of releases; initially identifying potential sampling parameters and locations, if needed; and obtaining all information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Synthetic Products Company (Synpro) facility in Cleveland, Ohio. The PA was completed on March 3, 1992. PRC gathered and reviewed information from Ohio EPA northeast district and central offices and from EPA Region 5 RCRA files. The VSI was conducted on April 20, 1992. It included interviews with a Synpro facility representative and a walk-through inspection of the facility. Two SWMUs and no AOCs were identified at the facility.

PRC completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included in Attachment A. The VSI is summarized and seven inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location, past and present operations (including waste management practices), waste generating processes, history of documented releases, regulatory history, environmental setting, and receptors.

2.1 FACILITY LOCATION

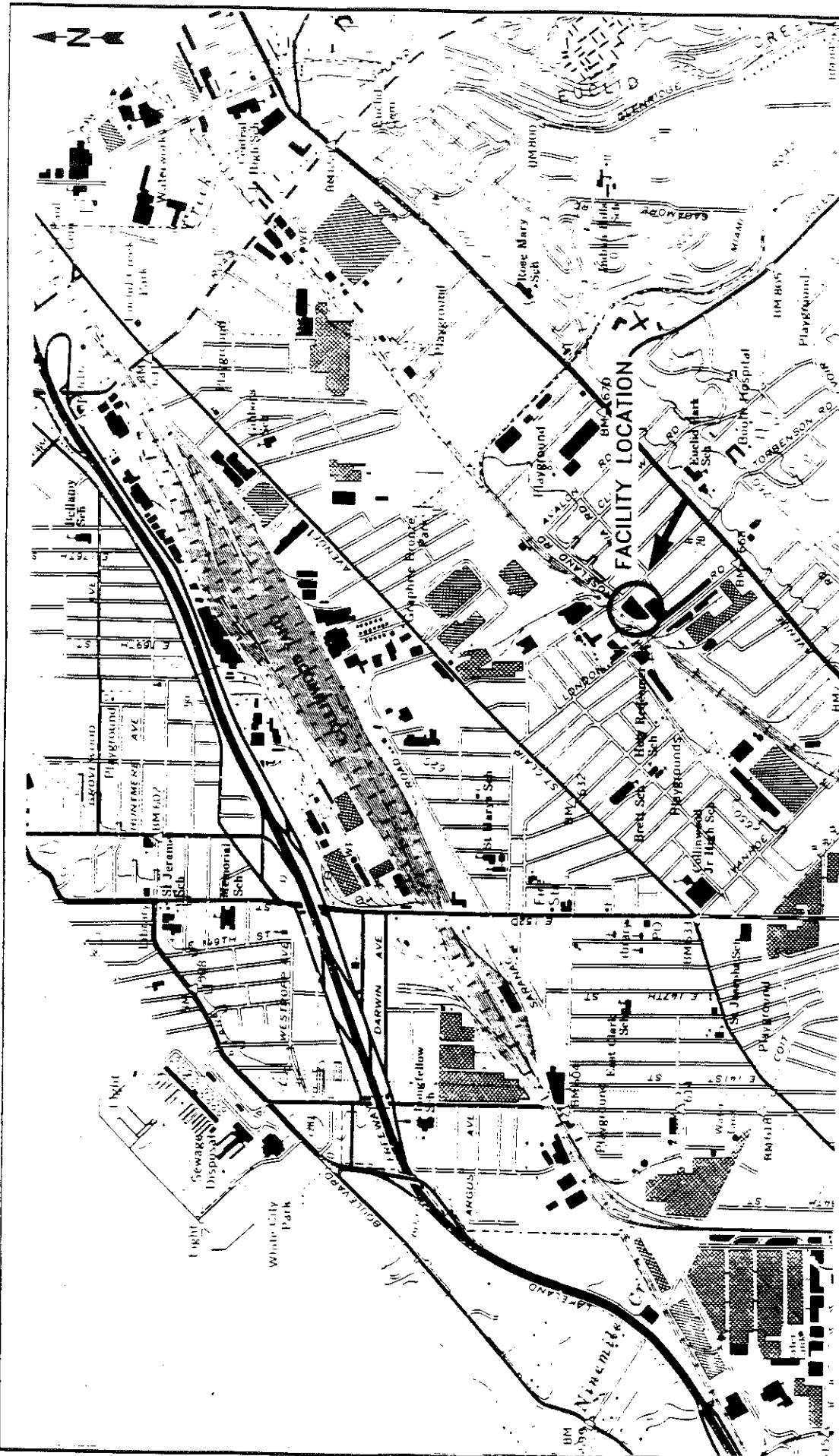
The Synthetic Products Company (the facility or Synpro) is located at 1636 Wayside Road, Cleveland, Cuyahoga County, Ohio (latitude 41°33'19" N, longitude 81°33'37" W) as shown in Figure 1. The facility occupies approximately one acre in a mixed industrial, commercial, and residential area.

The facility is bordered on the northwest by Norfolk and Western railroad tracks and another Synpro facility (1000 Wayside Road), on the west by the Norfolk and Western railroad tracks, London Road, and light industry, on the south by residences, and on the east by residences and light industry.

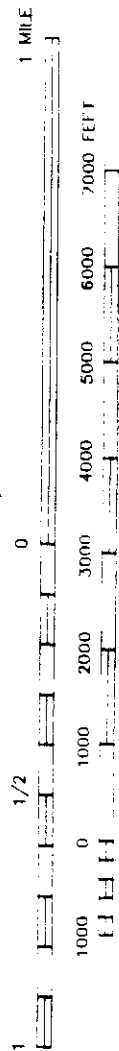
2.2 FACILITY OPERATIONS

The facility has been at its current location since 1950 and employs about 55 to 60 people. From 1950 to about 1980, the facility manufactured liquid, powder, and stearate stabilizers. The stabilizers were used as additives to strengthen plastics, mainly polyvinyl chloride (PVC). Manufacturing of liquid stabilizers was discontinued at the facility and moved to another location in 1980. The facility currently consists of one manufacturing building that houses the process lines. Two of the process lines produce barium and cadmium stearates. This process generates wastes containing barium (D005) and cadmium (D006). Raw materials for the production process include metal hydroxides in powder form that come in 50-pound or 25-pound sacks and liquid stearic acid. The stearic acid is delivered by tank trucks and stored in tanks outside the main manufacturing building. The process is a batch operation that is essentially an acid-base reaction. A metal base (for example, barium hydroxide) is mixed with heated stearic acid to form a metal stearate. The reaction takes place in an open kettle.

ENCLOSURE 4/2/84 MLD



SCALE 1:24,000



SCALE: 1" = 2,000'

Synthetic Products Co., Cleveland, Ohio

FIGURE 1

FACILITY LOCATION

ENVIRONMENTAL MANAGEMENT, INC.

SOURCE: MODIFIED FROM USGS, 1979

Cadmium stearate is made in a 750-gallon kettle. After the cadmium stearate has been formed, it is flaked onto a belt conveyor, where it dries and collects in a hopper. The product is then ground into a fine powder and packaged for shipment.

Barium stearate is made in a 7,000-gallon kettle. Barium monohydrate (dried barium hydroxide) is mixed with water to form a barium hydroxide solution. The barium hydroxide solution is then mixed with hot stearic acid to form the stearate. The product is then filtered through a pressure filter and a rotary vacuum filter, dried, and ground to a fine powder. Wastes generated by these process lines are in solid form and are stored in 55-gallon drums in the hazardous waste drum storage area (SWMU 2). The remaining process lines produce stearates that do not contain either barium or cadmium. All lines are batch processes. The final product is a fine powder. SWMUs at the facility are identified in Table 1. Figure 2 shows the facility layout, including SWMUs.

Plastic Specialties and Technology, Inc. bought this facility in 1985 and the facility's name became Synthetic Products Company. In 1989, the Synthetic Products Company bought the Synthetics Products Company Division of Plastic Specialties and Technologies, Inc. The facility name did not change.

2.3 WASTE GENERATING PROCESSES

The primary wastestreams generated at Synpro are kettle cleanup, filter, and test sample wastes. All other wastes are recycled into the production process. These wastes are generated during the production of stearate stabilizers. Wastes generated at the facility are summarized in Table 2. Annual generation rates are based on 1991 data on generation of hazardous waste.

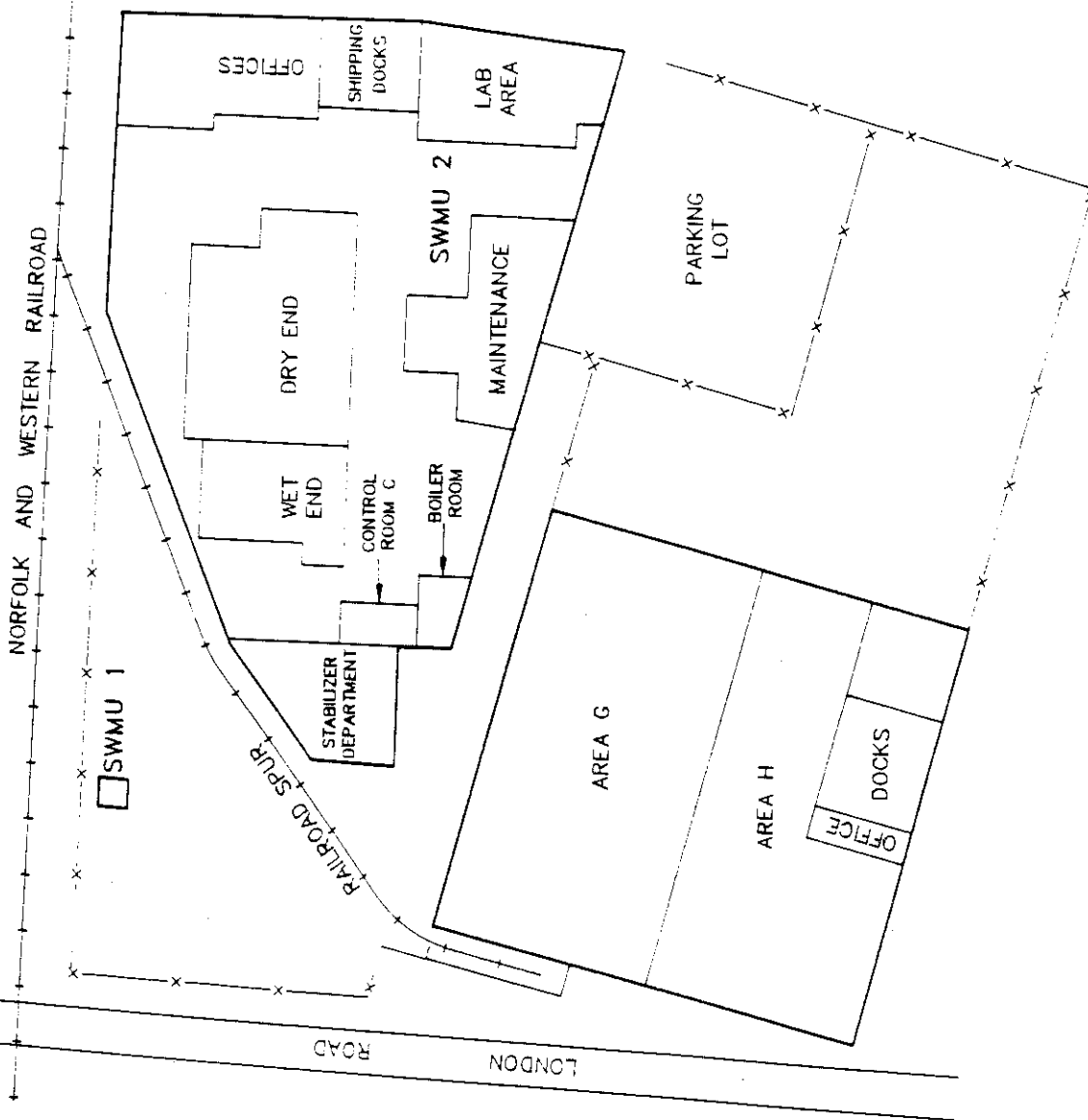
Hazardous waste containing barium (D005) and cadmium (D006) are generated by the production of barium and cadmium stearates. The process is a batch operation that is essentially an acid-base reaction. A metal base (for example, barium hydroxide) is mixed with heated stearic acid to form a metal stearate. The reaction takes place in an open kettle. Cadmium stearate is made in a 750-gallon kettle. Barium stearate is made in a 7000-gallon kettle. Wastes are generated when the kettles are cleaned or when test samples are run. Waste containing barium also is generated at the filters used in the barium stearate production process. All other wastes are recycled into the process. The waste is stored in 55-gallon drums in SWMU 2, the hazardous waste drum storage area. Floor sweepings are also placed into a 55-gallon drums that are stored in

TABLE 1
SOLID WASTE MANAGEMENT UNITS (SWMU)

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit*	Status
1	Former Hazardous Waste Drum Storage Building	Yes	Closed in 1988, Closure approved by OEPA in 1991
2	Hazardous Waste Drum Storage Area	No	Active, less than 90-day storage of hazardous waste

Note:

* A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B application.



LEGEND

- SWMU 1 FORMER HAZARDOUS WASTE
DRUM STORAGE BUILDING
- SWMU 2 HAZARDOUS WASTE DRUM
STORAGE AREA

SYNTHETIC PRODUCTS COMPANY
CLEVELAND, OHIO

FIGURE 2
FACILITY LAYOUT

NOT TO SCALE

SOURCE: MODIFIED FROM SYNTHETIC PRODUCTS COMPANY SKETCH
RECEIVED BY PRC ON APRIL 29, 1992

PRC ENVIRONMENTAL MANAGEMENT, INC.

**TABLE 2
SOLID WASTES**

Waste/EPA Waste Code	Source	Primary Management Unit
Solid waste containing barium (D005)	Barium stearate production process	1,2
Solid waste containing cadmium (D006)	Cadmium stearate production process	1,2

Notes:

- * Primary management unit refers to a SWMU that currently manages or formerly managed the waste.
-

SWMU 2. About 25,280 pounds of that waste is generated annually. The waste is transported off site by Chemical Waste Management, Inc. to its disposal facility in Emelle, Alabama.

A scrubber is used to control acid vapors from production of cadmium stearate. The scrubber removes acid odors generated during the production process. Wastewater from the scrubber is discharged to the sanitary sewer system. The sanitary sewer system leads to a publicly owned treatment works (POTW) managed by the Northeast Ohio Regional Sewer District. The wastewater is analyzed periodically and has never been found to contain any cadmium or other hazardous constituents (Sundermeyer, 1992).

In the past, 55-gallon drums of barium (D005) and cadmium (D006) wastes were stored in the former hazardous waste drum storage building (SWMU 1). This SWMU was closed in 1988. OEPA approved closure of this unit in 1991.

2.4 HISTORY OF DOCUMENTED RELEASES

There is no history of documented releases to ground water, surface water, air, or on-site soil as Synpro. No evidence of releases was observed during the VSI.

2.5 REGULATORY HISTORY

On August 18, 1980, Dart Industries, Inc. submitted to EPA a notification of hazardous waste activity for Synthetic Products Company, a Division of Dart Industries, Inc. Chemical Groups (Dart Industries, Inc. 1980a). The facility submitted a RCRA Part A permit application on November 14, 1980 (Dart Industries, Inc., 1980b). The application listed the following process codes and capacities: storage in containers S01 (50,000 gallons). The application listed wastes that were EP toxic for barium (D005) and cadmium (D006). These wastes have not been tested using the toxicity characteristic leaching procedure. The Ohio Hazardous Waste Facility Approval Board (HWFAB) granted Dart Industries, Inc. a hazardous waste facility installation and operation permit on November 30, 1981 (HWFAB, 1981). On April 25, 1984, EPA Region 5 granted the facility a final RCRA permit to act as a container storage facility (U.S. EPA, 1984). On January 7, 1985, the facility submitted to OEPA minor permit modifications, reflecting a change in ownership of the facility and minor changes in operating procedures (Synpro 1985a). Plastic Specialties and Technology, Inc. became the facility owner and the facility's name became Synthetic Products Company. On April 15, 1987, OEPA issued the facility a revised hazardous

waste installation and operation permit in final form. On August 1, 1988, the law firm of Thompson, Hine, and Flory, acting on behalf of Synthetic Products Company, notified EPA of the purchase by Synthetic Products Company of the Synthetic Products Company Division of Plastic Specialties and Technologies, Inc. (Thompson, Hine, and Flory, 1988a). The facility name in which the permit was held did not change.

On October 6, 1988, Synpro submitted to OEPA a closure plan and a request for withdrawal of its hazardous waste permit (Thompson, Hine, and Flory, 1988b). On July 6, 1989, OEPA notified the facility that the closure plan submitted did not meet the performance standard in Ohio Administrative Code (OAC) rule 3745-66-11 and did not comply with the pertinent parts of OAC rules 3745-66-12 and 3745-66-18. Consequently, OEPA disapproved the closure plan, stating that the plan did not contain the following information: 1) information and drawings regarding the container storage building (SWMU 1); 2) a topographic or county map of the area; 3) a detailed schedule of events; 4) an acceptable closure date; 5) acceptable health and safety measures; 6) acceptable dust control measures; or 7) a soil sampling plan and "clean" standards for contaminated soils (OEPA, 1989a). On October 2, 1989, the facility submitted a revised closure plan (Synpro 1989) that OEPA approved on December 8, 1989 (OEPA, 1989b). On June 25, 1991, OEPA conducted a postcertification inspection of the hazardous waste drum storage building (SWMU 1) and concluded that closure had been certified properly and that the facility should be classified as a small quantity generator (OEPA, 1991).

In the past, Synpro has had RCRA compliance problems. Inspections conducted between 1981 and 1984 noted violations regarding the facility's waste analysis plan, contingency plan, and weekly inspections of storage containers (OEPA, 1981, 1982, 1984a). An inspection conducted in 1984 also found deficiencies in the financial responsibility requirements for the facility (OEPA, 1984b). When ownership of the facility changed in 1984, the facility did not obtain liability insurance or establish financial assurances to cover closure costs (EPA, 1984b). Correspondence between OEPA and the facility indicates that the facility failed to comply with financial responsibility requirements (OEPA, 1985a,b,c,d, 1986). As a result of that failure, on July 29, 1987, the Director of OEPA issued a Final Findings and Orders letter stating that the facility did not meet the financial responsibility requirements imposed by OAC rule 3745-66-47 and that Synpro had failed to demonstrate appropriate liability coverage (OEPA, 1987b). Synthetic Products Company did not comply with the Director's Final Findings and Orders and was considered in violation by OEPA (OEPA, 1988a). On September 29, 1988, OEPA notified Synthetic Products Company of impending enforcement action because the facility had failed to

comply with the Director's Final Findings and Orders. (OEPA, 1988b). To comply with the order, the facility submitted on October 6, 1988 a closure plan and a request for withdrawal of its hazardous waste permit (Thompson, Hine, and Flory, 1988b).

The facility does have an air permit issued by the State of Ohio, Cleveland Division of Air Pollution Control for its co-generation unit for control of particulates and NO_x.

The facility has no history of complaints from area residents about odors.

On January 7, 1992, the Northeast Ohio Regional Sewer District issued to Synpro an industrial user administrative order regulating wastewater discharged from the facility to a publicly owned treatment works (POTW) (Northeast Ohio Regional Sewer District, 1992). The order covered federal pretreatment regulations and effluent limits for several organic and inorganic constituents. The cadmium limit was set at 2 mg/L. No limit was specified for barium. The facility has no history of CERCLA activities.

2.6 ENVIRONMENTAL SETTING

This section describes the climate, flood plain and surface water, geology and soils, and ground water in the vicinity of the Synpro facility.

2.6.1 Climate

The climate in Cuyahoga County is continental. The average daily temperature is 50 degree fahrenheit (°F). The lowest average daily temperature is 27°F in January. The highest average daily temperature is 72°F in July. In summer, northern areas nearest Lake Erie are markedly colder than the rest of the county. The average relative humidity in mid-afternoon is about 60 percent. The total average annual precipitation for the county is 35 inches. The mean annual lake evaporation is about 31 inches (U.S. Geological Survey [USGS], 1978). The 1-year, 24-hour maximum rainfall is 4.0 inches. The prevailing wind is from the southwest. Average wind speed is highest in January at 13 miles per hour from the southwest (U.S. Soil Conservation Service [USSCS], 1980 and National Oceanic and Atmospheric Administration, 1990).

Precipitation is well distributed during the year. Sixty percent of the total annual precipitation usually falls from April to September. Snow squalls are frequent from late fall

through winter, and total snowfall normally is heavy. Crop development early in the growing season is slowed by frequent cool winds from Lake Erie. Fall winds that blow from a relatively warm Lake Erie delay the first fall freeze and prolong the growing season for all crops. The average growing season in Cuyahoga County is about 225 days (USSCS, 1980).

2.6.2 Flood Plain and Surface Water

Surface waters at the site drain into a combined sewer system operated by the City of Cleveland; collection drains are located throughout the facility (Synpro, 1985b). Off-site surface waters also drain into this system. The nearest surface water, Euclid Creek, is located approximately 1.5 miles east of the facility and is used for recreational purposes. Euclid Creek discharges to Lake Erie. Lake Erie is located 1.75 miles northwest of the facility. The facility is not located in the 100-year flood plain (USGS, 1974).

2.6.3 Geology and Soils

Site-specific geology and soil information is not available; therefore, regional information is presented. Cuyahoga County is located in two physiographic provinces: the glaciated Allegheny Plateau of the Appalachian Plateau Province to the south and east, and the Eastern Lake and Till Plains section of the Central Lowland Province to the west and north. The line of demarcation between the two provinces is the Portage Escarpment, which runs northeast to southwest, just north of Cleveland. Topography in the Allegheny Plateau is characterized by mature river valleys, while the Central Lowland topography is controlled predominately by thick glacial deposits. Bordering Lake Erie is the Lake Plain area, a narrow strip averaging 4 miles in width and composed of lacustrine and beach ridge deposits (Cushing, Leverett and Van Horn, 1931; White, 1982).

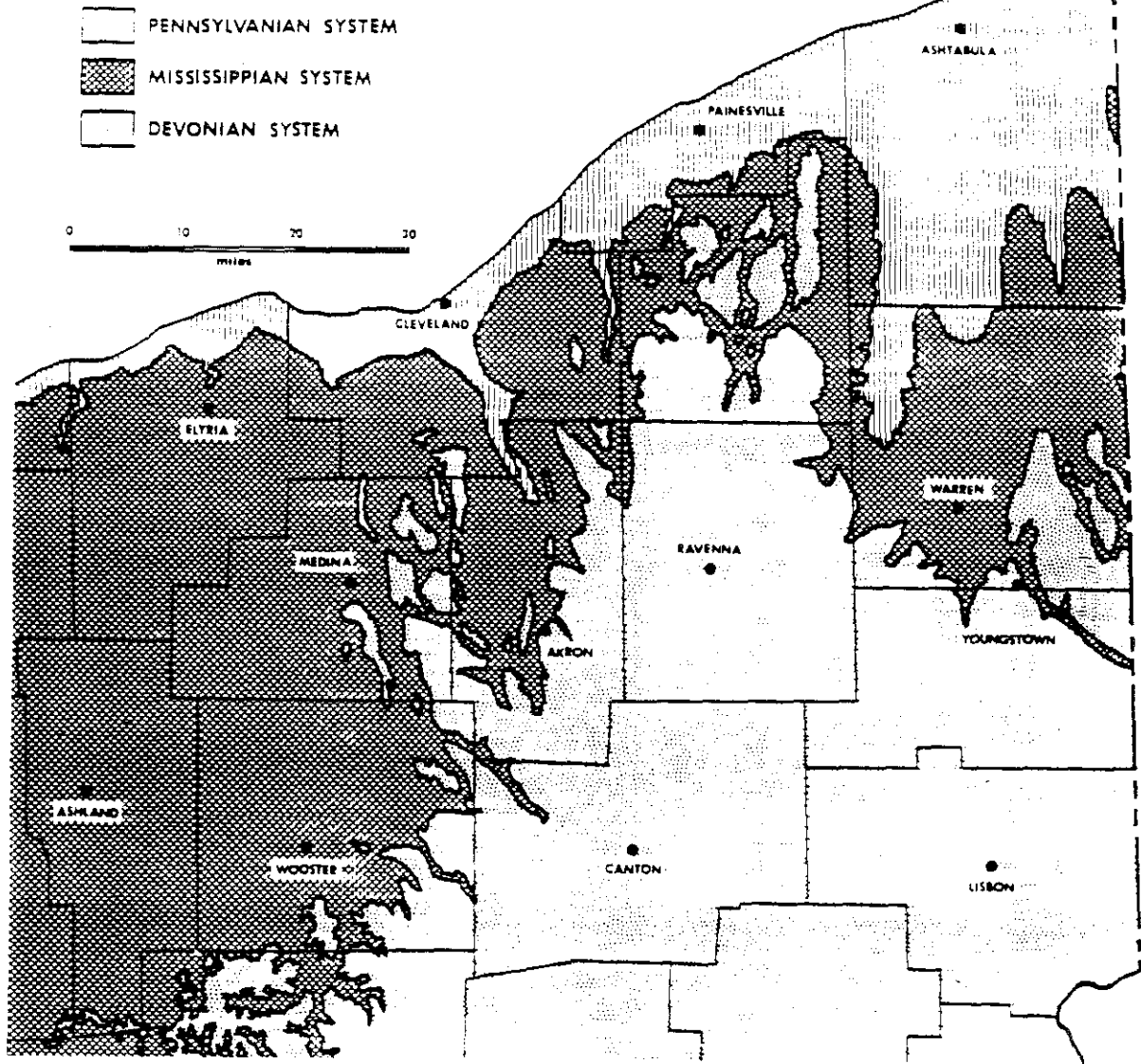
Two general classes of deposits exist: glacially derived, unconsolidated deposits of Quaternary age and consolidated sandstone and shale of Paleozoic age. During the Pleistocene epoch of the Quaternary period, several glaciers advanced and retreated in the region. The last glacial advances and retreats during the Wisconsin stage occurred in two distinct lobes: the Killbuck Lobe to the west and the Cuyahoga Lobe to the east (Cushing, Leverett and Van Horn, 1931; White, 1982). Specific glacial units discussed will not be correlated to a specific lobe because several of the units were synchronous deposits and have the same general characteristics.

Associated with the glacial deposits are glacial outwash deposits of sand and gravel that are located predominately in valleys and on valley sides. The majority of the glacial deposits are heterogenous, and they may contain discontinuous lenses and thin sheets of sand and gravel (White, 1982). Glacial deposits in the area range in thickness from 0 to 300 feet. South of the Lake Plain area, the upper most unit, the Hiram Till, is exposed. The Hiram Till is a clay till that ranges in thickness from 0 to more than 30 feet. The Kent-Navarre Till underlies the previous unit; it is composed of clayey sand and silt that ranges in thickness from 0 to 100 feet. The last Wisconsin age unconsolidated unit in the area is the Mogadore-Millbrook Till, which is also composed of clayey sand and silt (Banks and Feldmann, 1970; White, 1982). Pre-Wisconsinan age tills and outwash deposits unconformably overlie the bedrock in deep depressional surfaces, such as buried bedrock valleys. The Pre-Wisconsinan deposits are discontinuous across northeastern Ohio. These deposits are more than 60 feet thick in parts of Cuyahoga County and provide large quantities of high-grade gravel in the Mill Creek valley (White, 1982).

The bedrock units dip slightly to the south and south-southeast at about 20 feet per mile (Cushing, Leverett and Van Horn, 1931). Devonian age bedrock is exposed in the subcrop and along river valleys along Lake Erie. Bedrock units become progressively younger to the south (Figure 3). The uppermost bedrock unit is the Sharon Conglomerate of the Pottsville Group of Pennsylvanian age. It is approximately 0 to 150 feet thick. Underlying this unit is the Cuyahoga Group of Mississippian age, which is approximately 160 to 425 feet thick and is composed primarily of blue to gray shale, with alternating beds of sandy shale and sandstone. Figure 4 shows these formation as they occur under the Cleveland area (Williams, 1940). Underlying the Cuyahoga Group is the Berea sandstone, which ranges in thickness feet from 5 to 150. The Berea Sandstone overlies the Bedford shale, which is composed of firm-to-soft gray siliceous shale, ranging in thickness from 50 to 90 feet. This formation overlies the Ohio Shale of Devonian age, which is more than 400 feet thick. The Ohio Shale formation is predominately black carboniferous shale, with beds of greenish-gray shale. The Cleveland and Chagrin shales are members of the Ohio Shale formation. Underlying this unit is a series of older Paleozoic era limestones, and sandstones and shales (Cushing, Leverett and Van Horn, 1931; Banks and Feldmann, 1970; White, 1982).

The soil association under the area around the facility is called Urban Land. Urban land consists of nearly level and gently sloping areas that are covered by asphalt, concrete, buildings, and other impervious surfaces, such as parking lots, shopping and business centers, and industrial parks. It occurs mainly in the downtown business district and in corridors along main roads and

BEDROCK GEOLOGY OF NORTHEASTERN OHIO

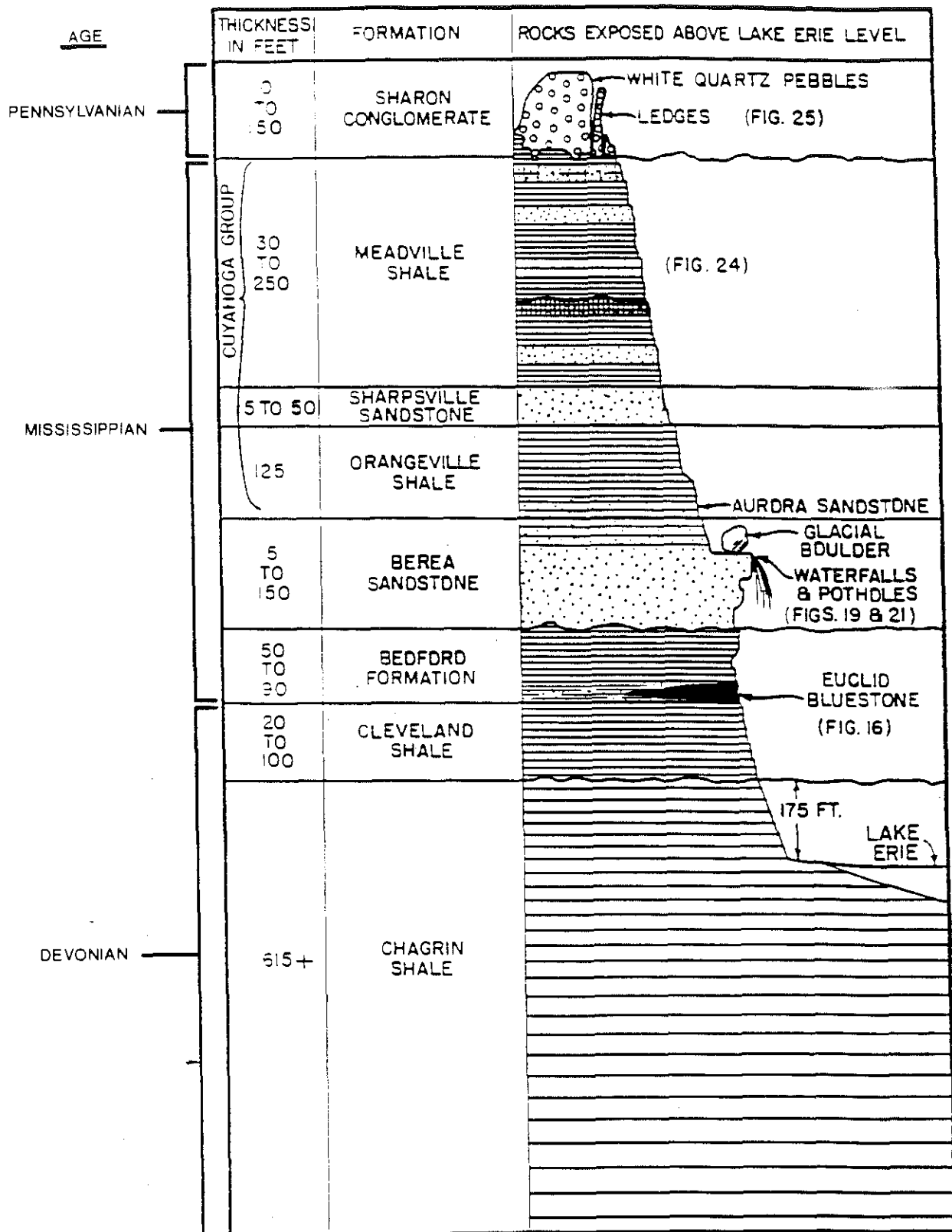


Synthetic Products Co., Cleveland, Ohio

FIGURE 3
BEDROCK GEOLOGY OF
NORTHEASTERN OHIO

PMC ENVIRONMENTAL MANAGEMENT, INC.

Source: Modified from Banks and Feldman, 1970



Synthetic Products Co., Cleveland, Ohio

FIGURE 4
REPRESENTATIVE GEOLOGIC
CROSS-SECTION OF THE CLEVELAND AREA

PRC ENVIRONMENTAL MANAGEMENT, INC.

streets. This soil association consists of about 80 percent of Urban Land and 20 percent soils of minor extent. Minor soils in these areas are the Mahoning, the Mitwanga, the Elnora, the Oshtemo, and the Allis soils. Some areas contain miscellaneous materials such as dredgings and industrial wastes. Sloping to steep areas are along the Cuyahoga River (USSCS, 1980).

2.6.4 Ground Water

Site-specific ground water information indicates that in certain local areas, the Ohio and Bedford shales underlying this site are completely unproductive of ground water. Generally, however, domestic supplies of 3 to 4 gpm may be developed, although such wells may have to be deeper than wells of corresponding yields in other aquifers (Winslow, 1952). Regionally, the use of ground water in the county is limited to water-bearing formations within the bedrock, alluvial and glacial outwash deposits found mostly in valleys, and, to a lesser extent, sand and gravel lenses and sheets associated with the glacial drift. Existing valleys generally contain thick deposits of sand and gravel from glacial outwash. Wells in these deposits can yield up to 500 gpm. The glacial outwash has an estimated hydraulic conductivity of 10^{-3} to 10^{-1} cm/sec (Bloyd, 1974; Fetter, 1988).

The glacial deposits also may be a source of ground water where the deposits overlie the Ohio Shale, especially where the drift is thick and contains a large percentage of sand (Cushing, Leverett and Van Horn, 1931). The hydraulic conductivity for such aquifers is estimated to be less than 10^{-3} cm/sec. Water-bearing formations within the Paleozoic bedrock include the Sharon Conglomerate and Berea Sandstone. Both aquifers have an estimated hydraulic conductivity greater than 10^{-3} (Bloyd, 1974). The Sharon Conglomerate is reported to have yields as much as 125 gpm, but domestic wells normally yield about 10 gpm. The Berea Sandstone yields as much as 20 gpm to domestic wells and 250 gpm to larger wells (Winslow, 1952). Generally, local ground water flow in shallow glacial aquifers is controlled by surface topography and discharges into nearby rivers or lakes. The regional ground water flow in the bedrock most likely is toward the Appalachian Basin to the south (Bloyd, 1974).

2.7 RECEPTORS

The Synpro facility occupies approximately one acre in a mixed industrial, commercial, and residential area in Cleveland, Ohio. Cleveland has a population of approximately 530,000 (U.S. Department of Commerce, 1988). The facility is bordered on the northwest by railroad

tracks and another Synpro facility (1000 Wayside Road), on the west by London Road, railroad tracks, and light industry, on the south by residences, and on the east by residences and light industry. The nearest school, Holy Redeemer School, is located about 0.5 miles west of the facility. Access to the facility is controlled by a fence surrounding the property.

The nearest surface water body, Euclid Creek, is located 1.5 miles east of the facility and is used for recreational purposes. Other surface-water bodies in the area include Lake Erie, which is located 1.75 miles northwest. Ground water is not used as drinking water, or for industrial, agricultural, or municipal water supply. The site has neither injection nor withdrawal wells. No ground-water wells are located within 1,000 feet of the facility (Synpro, 1985b).

There are no sensitive environments on the site. The nearest wetland is a riverine wetland located along Euclid Creek. The wetland is classified by the U.S. Fish and Wildlife Service as a riverine, lower perennial, open water wetland with an intermittently exposed or permanent water regime. There are also several lacustrine wetlands along the eastern shore of Lake Erie. They are classified as lacustrine, littoral, open water or beach and bar wetland with a water regime that is either intermittently flooded and temporary or intermittently exposed and permanent (U.S. Department of Interior, 1977).

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the 2 SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and PRC's observations. Figure 2 shows the SWMU locations.

SWMU 1

Former Hazardous Waste Drum Storage Building

Unit Description:

The unit is a single building separated from the manufacturing plant. It is located on the north side of the property and west of the manufacturing building. The building has aluminum siding with a concrete ramp that provides access for a fork lift. The ramp leads to a garage door on the south side of the building. A ramp inside the building descends to the concrete floor. The concrete floor is 30 feet by 30 feet, with a 5-inch concrete berm around the perimeter of the floor. The berm is part of the concrete floor. Consequently, there are no spaces, cracks, or gaps between the floor and the berm. There are two sumps, one on each side of the ramp inside the building. The sumps and berm act as secondary containment. The capacity of the drum storage building is eighty 55-gallon drums or 4,400 gallons. (See Photographs No. 1, No. 2, and No. 3 in Attachment B.)

Date of Startup:

1980

Date of Closure:

The unit was closed in 1988. OEPA approved the facility's certification of closure in 1991.

Wastes Managed:

Wastes containing barium (D005) and cadmium (D006)

Release Controls:

The floor is concrete, with a 5-inch concrete berm around the perimeter. There are no gaps, spaces, or cracks between the berm and the floor. Sumps are located on each side of the ramp leading into the building.

History of Documented Releases:

There is no history of documented releases of hazardous constituents to the ground water, surface water, air, or on-site soil.

Observations:

The building appeared in good condition during the VSI. Small surface cracks were noted in the floor in the vicinity of the sump. During the VSI, no evidence of any release was visible. The building currently is being used to store construction materials (PRC, 1992).

SWMU 2**Hazardous Waste Drum Storage Area**

Unit Description: This unit consists of a 20-foot by 5-foot space delineated in the manufacturing building. The unit has a concrete floor and is situated against a concrete wall near the east side of the building. A floor drain that is connected to the sanitary sewer is approximately 15 feet from the storage area. (See Photographs No. 4 and No. 5 in Attachment B.)

Date of Startup: 1988

Date of Closure: The unit currently is being used to store waste for less than 90 days.

Wastes Managed: Wastes containing barium (D005) and cadmium (D006).

Release Controls: The unit is situated on a concrete floor inside a building. If a release occurred, the walls and floor would provide secondary containment. A floor drain that is connected to the sanitary sewer is approximately 15 feet southwest of the unit.

History of Documented Releases: There is no history of documented releases from this unit to ground water, surface water, air, or on-site soil.

Observations: The unit appeared in good condition. Small surface cracks were noted in the concrete floor. There was no evidence of any releases noted during the VSI.

4.0 AREAS OF CONCERN

PRC did not identify any AOCs during the PA/VSI. The preliminary assessment did not reveal any specific information on past releases in areas not otherwise identified as SWMUs, and no AOCs were discovered during the VSI.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified two SWMUs at Synpro. Background information on the facility's location, operations, waste generating processes, release history, regulatory history, environmental setting, and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. AOCs are discussed in Section 4.0. Following are PRC's conclusions and recommendations for each SWMU. Table 3 summarizes the SWMUs at the Synpro facility and recommendations for further action.

SWMU 1

Former Hazardous Waste Drum Storage Building

Conclusions:

The unit is a 30-foot by 30-foot building separated from the manufacturing plant. The unit was used to store 55-gallon drums of wastes containing barium (D005) and cadmium (D006). The unit was closed in 1988. The potential for releases of hazardous waste or hazardous constituents to the ground water, surface water, air, or on-site soil is low. The potential is low because the unit was closed in 1988 and currently is inactive.

Recommendations:

PRC recommends no further action.

SWMU 2

Hazardous Waste Drum Storage Area.

Conclusions:

The unit consists of a 20-foot by 5-foot space delineated in the manufacturing building. The unit currently is being used to store waste for less than 90 days. The potential for releases of hazardous waste or hazardous constituents to the ground water, surface water, air, or on-site soil is low. The potential is low because the wastes managed are in solid form and resistant to flow. The wastes also are stored in drums inside the manufacturing building. However, there is a floor drain near the unit and secondary containment can be improved.

Recommendations:

PRC recommends repairing the surface cracks near SWMU 2. PRC also recommends improving the secondary containment for SWMU 2 by either sealing the drain near the SWMU or building a dike or berm around the SWMU. A second option for improving the secondary containment would be to store drums containing hazardous waste in SWMU 1, the former hazardous waste storage building, since it was designed for this purpose.

RELEASED

DATE

RIN #

INITIALS

INITIALS

ENFORCEMENT
CONFIDENTIAL

TABLE 3
SWMU SUMMARY

SWMU	Dates of Operation	Evidence of Release	Recommended Further Action
1. Former Hazardous Waste Drum Storage Building	1980 to 1988	None	No further action at this time.
2. Hazardous Waste Drum Storage Area	1988 to present	None	Seal surface cracks in floor. Seal drain or provide improved secondary containment.

RELEASED

DATE

RIN #

INITIALS

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- OEPA, 1985b. OEPA letter regarding financial responsibility requirements, June 14.
- OEPA, 1985c. OEPA letter regarding financial responsibility requirements, July 8.
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- Sundermeyer, John, 1992. Visual site inspection, April 20.
- Synthetic Products Company (Synpro), 1985a. Revised Part A permit application letter, January 7.
- Synpro, 1985b. RCRA Part B Permit, Section B, October 17.
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ATTACHMENT A

EPA PRELIMINARY ASSESSMENT FORM 2070-12



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE OH 02 SITE NUMBER OHD07783603

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site)
Synthetic Products Company

02 STREET, ROUTE NO. OR SPECIFIC LOCATION IDENTIFIER
1636 Wayside Road

03 CITY
Cleveland

04 STATE
OH

05 ZIP CODE
44112

06 COUNTY
Cuyahoga

07 COUNTY CODE
18

08 CONG DIST
19

09 COORDINATES: LATITUDE 41°33'19"N LONGITUDE 81°33'37"W

10 DIRECTIONS TO SITE (Starting from nearest public road)

Take Euclid Avenue north to Wayside Road. Take a left on Wayside. Facility is on the left.

III. RESPONSIBLE PARTIES

01 OWNER (if known)
Synthetic Products Company

02 STREET (Business, mailing residential)
1000 Wayside Road

03 CITY
Cleveland

04 STATE
OH

05 ZIP CODE
44110

06 TELEPHONE NUMBER
(216) 531-6010

07 OPERATOR (if known and different from owner)

08 STREET (Business, mailing, residential)

09 CITY

10 STATE

11 ZIP CODE

12 TELEPHONE NUMBER

13 TYPE OF OWNERSHIP (Check one)

- ☒ A. PRIVATE ☐ B. FEDERAL: _____ ☐ C. STATE ☐ D. COUNTY ☐ E. MUNICIPAL
(Agency Name)
☐ F. OTHER _____ ☐ G. UNKNOWN
(Specify)

14. OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)

- ☒ A. RCRA 3010 DATE RECEIVED: 08/18/80 ☐ B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: ____/____/____ ☐ C. NONE
MONTH DAY YEAR MONTH DAY YEAR

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION

BY (Check all that apply)

- ☒ YES DATE 04/20/92 ☐ A. EPA ☒ B. EPA CONTRACTOR ☐ C. STATE ☐ D. OTHER CONTRACTOR
☐ NO ☐ E. LOCAL HEALTH OFFICIAL ☐ F. OTHER: _____
(Specify)

CONTRACTOR NAME(S): PRC Environmental Management, Inc.

02 SITE STATUS (Check one)

- ☒ A. ACTIVE ☐ B. INACTIVE ☐ C. UNKNOWN

03 YEARS OF OPERATION

1950 | present
BEGINNING YEAR ENDING YEAR ☐ UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

Hazardous substances found on site include solid wastes containing barium (D005) and cadmium (D006)

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

The potential hazard to environment and/or population is low.

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.)

- ☐ A. HIGH (Inspection required promptly) ☐ B. MEDIUM (Inspection required) ☒ C. LOW (Inspect on time-available basis) ☐ D. NONE (No further action needed; complete current disposition form)

VI. INFORMATION AVAILABLE FROM

01 CONTACT
Kevin Pierard

02 OF (Agency/Organization)
U.S. EPA

03 TELEPHONE NUMBER
(312) 886-4448

04 PERSON RESPONSIBLE FOR ASSESSMENT
Thomas Sinski

05 AGENCY

06 ORGANIZATION
PRC

07 TELEPHONE NUMBER
(703) 556-2811

08 DATE
05/04/92
MONTH DAY YEAR

ATTACHMENT B

VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

SYNTHETIC PRODUCTS COMPANY CLEVELAND, OHIO OHD 077 783 603

Date: April 20, 1992

Facility Representatives: John Sundermeyer, Director of Operations - Cleveland
(216) 531-6010

Inspection Team: Thomas Sinski, PRC Environmental Management, Inc. (PRC)
(703)-556-2811
Shoaib Mahmud, PRC (703)-883-8649

Photographer: Thomas Sinski

Weather Conditions: Calm, overcast with intermittent rain, temperature approximately 70°F

Summary of Activities: The visual site inspection (VSI) began at approximately 9:30 a.m. with an introductory meeting. The inspection team discussed the purpose of the VSI and the agenda for the inspection. John Sundermeyer then discussed the facility's past and current operations, solid wastes generation, and release history. Most of the information was exchanged on a question-and-answer format. Mr. Sundermeyer provided the inspection team with copies of the documents requested. The VSI tour began at 10:20 a.m. The current hazardous waste storage area (SWMU 2) was inspected first. The area contained 4 drums. Photographs of SWMU 2 taken during the VSI did not turn out. The pictures of SWMU 2 shown in this report were taken by Mr. Sundermeyer on April 29, 1992. The manufacturing process areas were inspected next. The former hazardous waste storage building (SWMU 1) was inspected last. The storage area was a 30-foot by 30-foot building with aluminum siding and a garage door opening for a fork lift. The floor was concrete with a 5-inch berm around the perimeter. Sumps were located on each side of the entrance ramp inside the building. The building contained construction materials during the VSI. The inspection tour concluded at approximately 11:00 a.m., when the inspection team returned to the office for debriefing. The inspection team left the site at approximately 11:10 a.m.



Photograph No. 1
Orientation: South
Date: April 20, 1992
Description: The photograph shows the interior of the former hazardous waste drum storage building. The garage door is the fork lift entrance.



Photograph No. 2
Orientation: South
Date: April 20, 1992
Description: The photograph shows the interior of the former hazardous waste drum storage building. Sump inside the building is shown in the base of the photograph.



Photograph No. 3

Orientation: North

Description: The exterior of former hazardous waste drum storage building

Location: SWMU 1

Date: April 20, 1992



Photograph No. 4

Orientation: North

Description: Hazardous waste drum storage area

Location: SWMU 2

Date: April 29, 1992



Photograph No. 5
Orientation: South
Description: Hazardous waste storage area

Location: SWMU 2
Date: April 29, 1992

ATTACHMENT C
VISUAL SITE INSPECTION FIELD NOTES

Aug. 1891

1/20/12

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Abuse on Site in Synagogue Areas
viro Lawyer: John Swenson (J.S.)

1000 Green Heron: Tadpole Swimmers (T.S.)

Postage prepaid, June 5, 1948

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Ans. C. D. 100

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1) Cell Structure : Classmate Page 64

Dr. Spence Co. (1st & Second)

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Mr. J. Parsons Secy Nat. Hist. Servs.
Wash. D. C. Marine Corps Bldg.

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1976-75 5000-10000 gal. Cap 5000
1976-75 5000-4000 lbs. Punters.

1846. 1847. 1848. 1849. 1850. 1851. 1852. 1853. 1854. 1855. 1856. 1857. 1858. 1859. 1860. 1861. 1862. 1863. 1864. 1865. 1866. 1867. 1868. 1869. 1870. 1871. 1872. 1873. 1874. 1875. 1876. 1877. 1878. 1879. 1880. 1881. 1882. 1883. 1884. 1885. 1886. 1887. 1888. 1889. 1890. 1891. 1892. 1893. 1894. 1895. 1896. 1897. 1898. 1899. 1900. 1901. 1902. 1903. 1904. 1905. 1906. 1907. 1908. 1909. 1910. 1911. 1912. 1913. 1914. 1915. 1916. 1917. 1918. 1919. 1920. 1921. 1922. 1923. 1924. 1925. 1926. 1927. 1928. 1929. 1930. 1931. 1932. 1933. 1934. 1935. 1936. 1937. 1938. 1939. 1940. 1941. 1942. 1943. 1944. 1945. 1946. 1947. 1948. 1949. 1950. 1951. 1952. 1953. 1954. 1955. 1956. 1957. 1958. 1959. 1960. 1961. 1962. 1963. 1964. 1965. 1966. 1967. 1968. 1969. 1970. 1971. 1972. 1973. 1974. 1975. 1976. 1977. 1978. 1979. 1980. 1981. 1982. 1983. 1984. 1985. 1986. 1987. 1988. 1989. 1990. 1991. 1992. 1993. 1994. 1995. 1996. 1997. 1998. 1999. 2000. 2001. 2002. 2003. 2004. 2005. 2006. 2007. 2008. 2009. 2010. 2011. 2012. 2013. 2014. 2015. 2016. 2017. 2018. 2019. 2020. 2021. 2022. 2023. 2024. 2025. 2026. 2027. 2028. 2029. 2030. 2031. 2032. 2033. 2034. 2035. 2036. 2037. 2038. 2039. 2040. 2041. 2042. 2043. 2044. 2045. 2046. 2047. 2048. 2049. 2050. 2051. 2052. 2053. 2054. 2055. 2056. 2057. 2058. 2059. 2060. 2061. 2062. 2063. 2064. 2065. 2066. 2067. 2068. 2069. 2070. 2071. 2072. 2073. 2074. 2075. 2076. 2077. 2078. 2079. 2080. 2081. 2082. 2083. 2084. 2085. 2086. 2087. 2088. 2089. 2090. 2091. 2092. 2093. 2094. 2095. 2096. 2097. 2098. 2099. 2100. 2101. 2102. 2103. 2104. 2105. 2106. 2107. 2108. 2109. 2110. 2111. 2112. 2113. 2114. 2115. 2116. 2117. 2118. 2119. 2120. 2121. 2122. 2123. 2124. 2125. 2126. 2127. 2128. 2129. 2130. 2131. 2132. 2133. 2134. 2135. 2136. 2137. 2138. 2139. 2140. 2141. 2142. 2143. 2144. 2145. 2146. 2147. 2148. 2149. 2150. 2151. 2152. 2153. 2154. 2155. 2156. 2157. 2158. 2159. 2160. 2161. 2162. 2163. 2164. 2165. 2166. 2167. 2168. 2169. 2170. 2171. 2172. 2173. 2174. 2175. 2176. 2177. 2178. 2179. 2180. 2181. 2182. 2183. 2184. 2185. 2186. 2187. 2188. 2189. 2190. 2191. 2192. 2193. 2194. 2195. 2196. 2197. 2198. 2199. 2200. 2201. 2202. 2203. 2204. 2205. 2206. 2207. 2208. 2209. 2210. 2211. 2212. 2213. 2214. 2215. 2216. 2217. 2218. 2219. 2220. 2221. 2222. 2223. 2224. 2225. 2226. 2227. 2228. 2229. 2230. 2231. 2232. 2233. 2234. 2235. 2236. 2237. 2238. 2239. 2240. 2241. 2242. 2243. 2244. 2245. 2246. 2247. 2248. 2249. 2250. 2251. 2252. 2253. 2254. 2255. 2256. 2257. 2258. 2259. 2260. 2261. 2262. 2263. 2264. 2265. 2266. 2267. 2268. 2269. 2270. 2271. 2272. 2273. 2274. 2275. 2276. 2277. 2278. 2279. 2280. 2281. 2282. 2283. 2284. 2285. 2286. 2287. 2288. 2289. 2290. 2291. 2292. 2293. 2294. 2295. 2296. 2297. 2298. 2299. 2300. 2301. 2302. 2303. 2304. 2305. 2306. 2307. 2308. 2309. 2310. 2311. 2312. 2313. 2314. 2315. 2316. 2317. 2318. 2319. 2320. 2321. 2322. 2323. 2324. 2325. 2326. 2327. 2328. 2329. 2330. 2331. 2332. 2333. 2334. 2335. 2336. 2337. 2338. 2339. 2340. 2341. 2342. 2343. 2344. 2345. 2346. 2347. 2348. 2349. 2350. 2351. 2352. 2353. 2354. 2355. 2356. 2357. 2358. 2359. 2360. 2361. 2362. 2363. 2364. 2365. 2366. 2367. 2368. 2369. 2370. 2371. 2372. 2373. 2374. 2375. 2376. 2377. 2378. 2379. 2380. 2381. 2382. 2383. 2384. 2385. 2386. 2387. 2388. 2389. 2390. 2391. 2392. 2393. 2394. 2395. 2396. 2397. 2398. 2399. 2400. 2401. 2402. 2403. 2404. 2405. 2406. 2407. 2408. 2409. 2410. 2411. 2412. 2413. 2414. 2415. 2416. 2417. 2418. 2419. 2420. 2421. 2422. 2423. 2424. 2425. 2426. 2427. 2428. 2429. 2430. 2431. 2432. 2433. 2434. 2435. 2436. 2437. 2438. 2439. 2440. 2441. 2442. 2443. 2444. 2445. 2446. 2447. 2448. 2449. 2450. 2451. 2452. 2453. 2454. 2455. 2456. 2457. 2458. 2459. 2460. 2461. 2462. 2463. 2464. 2465. 2466. 2467. 2468. 2469. 2470. 2471. 2472. 2473. 2474. 2475. 2476. 2477. 2478. 2479. 2480. 2481. 2482. 2483. 2484. 2485. 2486. 2487. 2488. 2489. 2490. 2491. 2492. 2493. 2494. 2495. 2496. 2497. 2498. 2499. 2500. 2501. 2502. 2503. 2504. 2505. 2506. 2507. 2508. 2509. 2510. 2511. 2512. 2513. 2514. 2515. 2516. 2517. 2518. 2519. 2520. 2521. 2522. 2523. 2524. 2525. 2526. 2527. 25

at 1000 ft. on road.

Long in the Church (1889)

[illegible]

SA 32644 (1944) DIST 53531 SA 32644

Immunology - Dr. David Goldstein

51

10/15

Address: W. R. R. R. (Chambersburg) 4/2/42

- 1) 750 gal. Kettle (1000)
- 2) 100 (1000) (100)
- 3) 1000 (1000) (100)
- 4) 1000 (1000) (100)
- 5) 1000 (1000) (100)
- 6) 1000 (1000) (100)

Sum

1000 (1000) (100)

1000 (1000) (100)

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(13) 4/2/42

1000 (1000) (100)

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1000 (1000) (100)

1000 (1000) (100)

1000 (1000) (100)

1000 (1000) (100)

1051

"WHITE STAPLED IN GASKETS 1 DAY
PREP TO BE UP BY CHINA WARE
MAGNET" I.S.

PROT 243 IN OLD DEAN STORAGE
AREA BLDG. (D.S.A.B.) - NO CHANGE
PROT 445 UP ON OUTSIDE OF D.S.B.
DUST REMOVAL OF SPOTS, IF ANY
IN NEW STORAGE AREA. THE DUST
CONSIST OF MIXED STORAGE WHICH
IS USED AS AN OPERATING IN
CONTENT. ACTS AS AN UNDERSTANDING
AGENT WHEN PLACED IN A SURVEY.

I.S.

10 SB END POLE OF FACTORY BURN
MID I.S. OFFICE TO WRAP UP.

NO FUNCTIONAL SYSTEM FOR AIR
W/IN MANUFACTURING AREA.

11/10/82

(8)

4/10/82

TEST HAVE FUNCTIONAL SYSTEM TO
OUR PARTICLES GENERATED DURING
PROCESSES.

-LIT RUN 6 INPS 2 YEARS - CLEAN UP
WATER WASTE TIME BECAUSE OF
WASTE GENERATED - RECALCULATED
W/REMOVED BY CREAT CURVE MAGNET
11:07 - NO MORE DISCOUNTS - 11/11/82
FOR COLLECTOR P. S.

11:10. CONSIDERED BEHAVING A BURNING.
BECAUSE SOME BURNING / PROTECT S
CONSIDERED OFF SITE (S)

11:13

11/10/82

T.S. & S.M.

11.15 Tour Perimeter Survey 4/20/72

The Perimeter is bounded by

A Railroad on the North Side.

Other Side of Track - Light Industrial

Other Synthetic Prod. (over a road)

East of Highway, Residential &

Chemical Old Trunk Road

South is Housing Co. Residence

Areas also waste & at synth. Prod.

West is Covered by Lowlands

Low Industrial Areas - Pesticides

Low - A. S. S. & Anchor Industrial

Inc.

11.26 Final Tour of Perimeter.

~~S.M. 4/20/72~~

~~S.M. 4/20/72~~



CLEVELAND HILTON SOUTH

(1)

4/20/92. Tom Lippman and Francis Misakian

9:34 a.m. arrived at Lyndette Products, Winter
cloudy with light drizzle, about 70°F.

Met with John Lunkheimer at 9:37 A.M.

Did have a part B approved around 1987.

9:41 Locally operations:

Metal stearates and liquid stabilizers liquid
stabilizers moved to another plant in 1980.

Metal stearates contain cadmium or barium.

Powder stabilizers also used but discontinued
around 1980. Stabilizer added to plastic
for stabilization. Stabilizers may contain cadmium
barium. Calcium stearate, zinc stearate, any
stearate is possible for a stabilizer.

9:48. Operations started in 1950 on synthetic
products. Run by same owner until 1978.

1950's making liquid, powder, and stearates
stabilizers. Liquid and powder stabilizers stopped
in 1980. Approximately 55-60 employees. 7 shifts
7 days/week



Part A filed 1980. Part 3 filed around 1984. Part 3 issued April 25, 1985. 2
Size of site is unknown. Probably about 1 acre. Facility consists of one building. 5 manufacturing processes. 2 use hazardous cadmium stearate. Heat stearic acid and ~~on~~ cadmium. Mix barium monohydrate and water to make barium hydroxide. Add stearic acid. The other 3 processes also use stearic acid but use nonhazardous stearates. Process is batch process. Typically 1000 gallons, other batches are 500 lbs. (prior to 1980).

Wastes were cadmium and barium wastes. Stored in drums. Basically an acid base reaction. Most wastes are turned or recycled into product. Wastes (Cd, Ba) generated mostly from cleaning of tanks. Most cleaning waste is recycled into next batch. Waste also consists of samples to be tested.

Open tank with 4000 gallon of stearic acid

add calcium oxide. Take the calcium
hydroxide in a salt flask, grind it and
package it. End form of a powder.

~~From~~ Barium nitrate in 7000 gallon open
kettle add H₂O and barium monohydrate and
stearic acid filter and dry it.

Drum storage is located in a drum
storage building. Capacity of 80 drums.

Chem waste management removes the drums
a couple times a year. Typically 8-10 drums
per trip.

Obtained Part B in 1984 closed drum storage
building in 1988. ~~to~~ Couldn't get insurance
so they withdrew the Part B.

Now operating as small quantity generator.



Permit to discharge given to receiver. No limits
 on volume or calcium issued by POTW.
 Permit to permit. A number of air permits
 issued by state & other, Cleveland division
 of air pollution control. Air permits for
 particulates.

10:19 a.m. Permit for Cogeneration plant for Rtx.
 Cogeneration for electric, steam, hot water.

10:21 Tour. Safety hazardous. Dust ~~explosion~~ explosion
 hazardous.

Hazardous waste storage area. 55 gallon
 drums. Collection area inside the building
 concrete floor. With partially sealed drain
 goes to sanitary sewer. Drums are stored
 until they can be transferred to a Hazmat
 container. large paper cart. ~~Large~~ bulk packaging
 intermediate

Calcium stearate bulk. 750 gallons. Covered
 with fine white powder. Hauler connected to
 the vessel to remove particles and odor.




water from scrubber goes to sanitary sewer.
Barium stearate 2 bottles. 7500 gallon
capacity. Has strainer filter after mixing.
Then used.

10:38 Barium stearate held ~~the~~ⁱⁿ tanks. Small
retention reservoir under the tank.

~~As~~ Storage site for barium stearate when
to a dryer and then packaging.

Old liquid stabilizer area. Discontinued
in 1980. Typically mixed a organo-phosphate and
~~and~~ a cadmium stearate. Now used to
make non-hazardous products.

10:44 Hazardous waste storage building

Ramp with garage door going into an aluminum
sided building. Building contained some
construction materials.  drums. Floor did
have cracks, did not look like they penetrated.

(6)

Had 2 circular sumps, one on each side
of the ramp on the inside.

Current hazardous waste area contains
drum that contain powder wastes

Approximately 3 feet by 3 feet.

Concrete floor with approximately 5 inch
curb around the perimeter. Bern is
connected to the concrete floor.

Spills. One drum leaked into the sump
and was cleaned up. Unknown when it
happened. Contained lithium and cadmium. Discovered
during routine inspection.

Current drum storage area. Wants to
transfer to bulk containers just 1 or 2
day prior to shipment by Chem Waste.

10:54 All floor sweepings are returned/recycled
as products. John said the facility
has never had ~~any~~ any problems with
cadmium or barium in water discharge to sewers.

4-20-92 T.L.

(7)

Floor sweeping also used
as concrete additive.

Run concluded at 10:56 AM.
Air is filtered in 8 baghouse
to collect product. There
are no air filter or ventilation
systems used to clean the
ambient air in the manufacturing
building. All surface water
drains to POTW.

4-20-92 T.L.

(8)

11:02 Debriefing

Wastes: cadmium stearate
cleanouts, barium stearate
scrap and samples. And
any other spills. Cadmium
is run about 6 times
a year. Amount of waste
generated depends on the
types of products produced.

4/20/92
T.L.

(9)

11:11 Debriefing concluded.





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

RECEIVED
WMD RECORD CENTER

SEP 11 1995

REPLY TO THE ATTENTION OF:

HRE-8J

April 1, 1992

Mr. John Sundermeyer
Director of Operations
Synthetic Products Company
1636 Wayside Road
Cleveland, OH 44112

Re: Visual Site Inspection
Synthetic Products Company
1636 Wayside Road
Cleveland, OH
OHD 077 783 603

Dear Sundermeyer:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment including a Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) Section 3007 and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA) Section 104(e). The referenced facility has generated, treated, stored, or disposed of hazardous waste subject to RCRA. The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern (AOCs) to make a cursory determination of their condition by visual observation. The definitions of SWMUs and AOCs are included in Attachment I. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of the units at the facility and the waste management practices used.

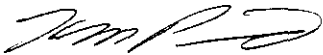
April 1, 1992
Mr. Sundermeyer
Page 2

The VSI has been scheduled for Monday, April 20, 1992 at 9:00 a.m. The inspection team will consist of Thomas Sinski and Shoaib Mahmud of PRC Environmental Management, Inc., a contractor for the U.S. EPA. Representatives of the [enter state agency name] may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, environmental permits (air, NPDES), manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI.

If you have any questions, please contact me at (312) 886-4448 or Francene Harris at (312) 886-2884. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions and Executive Summary portion will be sent when the report is available.

Sincerely yours,



Kevin M. Pierard, Chief
OH/MN Technical Enforcement Section

Enclosure

cc: Janine Secord, OEPA - Central Office
David Wertz, OEPA - Northeast District



SYNTHETIC PRODUCTS CO.
16601 St. Clair Avenue
Cleveland, Ohio 44110
(216) 531-6010
Telex: 98-5494

February 27, 1986

U.S. EPA
Region 5
230 South Dearborn St.
Chicago, Ill. 60604
Attn: SHSJCK-13

RECEIVED

MAR 03 1986

SWD - AIS
U.S. EPA, REGION V

Dear Sir:

Please find enclosed the completed form "Certification
Regarding Potential Releases From Solid Waste Management Units"
which you requested.

RECEIVED

MAR 03 1986

SOLID WASTE DIVISION
U.S. EPA, REGION V

Very truly yours,

J.C. Sundermeyer

J.C. Sundermeyer
Director of Operations

JCS/cc
attachment

CERTIFICATION REGARDING POTENTIAL RELEASES FROM
SOLID WASTE MANAGEMENT UNITS

FACILITY NAME: SYNTHETIC PRODUCTS COMPANY

EPA I.D. NUMBER: OHD 077783603

LOCATION CITY: CLEVELAND

STATE: OHIO

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTE UNITS CURRENTLY SHOWN IN YOUR PART A APPLICATION

| | <u>YES</u> | <u>NO</u> |
|---|---------------|-----------|
| • Landfill | <u> </u> | <u>X</u> |
| • Surface Impoundment | <u> </u> | <u>X</u> |
| • Land Farm | <u> </u> | <u>X</u> |
| • Waste Pile | <u> </u> | <u>X</u> |
| • Incinerator | <u> </u> | <u>X</u> |
| • Storage Tank (Above Ground) | <u> </u> | <u>X</u> |
| • Storage Tank (Underground) | <u> </u> | <u>X</u> |
| • Container Storage Area | <u> </u> | <u>X</u> |
| • Injection Wells | <u> </u> | <u>X</u> |
| • Wastewater Treatment Units | <u> </u> | <u>X</u> |
| • Transfer Stations | <u> </u> | <u>X</u> |
| • Waste Recycling Operations | <u> </u> | <u>X</u> |
| • Waste Treatment, Detoxification | <u> </u> | <u>X</u> |
| • Other <u> </u> | <u> </u> | <u>X</u> |

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions and location at facility. Provide a site plan if available.

NOTE: Hazardous wastes are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

3. For the units noted in Number 1 above and also those hazardous waste units in your Part A application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or may still be occurring.

Please provide the following information

- a. Date of release
- b. Type of waste released
- c. Quantity or volume of waste released
- d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

NONE

4. In regard to the prior or continuing releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C. 6902 et seq. and 40 CFR 270.11(d))

THOMAS JENNINGS - PRESIDENT

Typed name (and Title)

Thomas Jennings
Signature

2-26-86

Date